

**RCRA COMPLIANCE EVALUATION INSPECTION REPORT**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 9**  
**HAZARDOUS WASTE MANAGEMENT DIVISION**  
**WASTE COMPLIANCE BRANCH**

**Purpose:** RCRA Compliance Evaluation  
Inspection

**Facility:** Chalum, Inc.  
San Tan Industrial Park  
Gila Indian Reservation  
Sacaton, Arizona 85247

**Mailing Address:** P.O. Box 70  
Sacaton, Arizona 85247

**Facility ID Number:** No EPA ID Number at time of  
inspection

**Date of Inspection:** February 9, 1993

**EPA Representatives:** Laura L. Gentile  
Environmental Scientist  
(415) 744-2152

Pat Kuefler  
Environmental Scientist  
(415) 744-2144

**Tribal Investigator:** Lee Ballard  
Hazardous Materials Specialist  
Gila River Indian Reservation  
(602) 562-3301

**Facility Representatives:** Marvin Enos, Plant Manager  
(602) 418-3425

**Report Prepared By:** Laura L. Gentile  
Environmental Scientist  
(415) 744-2152

**Report Date:** March, 1993

RCRA Inspection Report  
U.S. Environmental Protection Agency  
Region IX  
Hazardous Waste Management Division  
Waste Compliance Branch

**BACKGROUND**

The purpose of this inspection was to determine the compliance of the Chalum facility with hazardous waste regulations promulgated under the Resource Conservation and Recovery Act (RCRA). The parent company is located at 3355 W. Alabama, Suite 400, Houston, Texas 77098, (713) 627-9011. This facility manufactures aluminum sulfate, which is sold to wastewater treatment plants such as the City of Phoenix. The process of manufacturing the aluminum sulfate involves mixing aluminum hydrate with solid sulfuric acid and water in a digester. The solid sulfuric acid is obtained through a mining process. The resulting aluminum hydrate product is then filtered and placed into fiberglass storage tanks.

**REGULATORY HISTORY**

Since the inspection, Chalum has submitted a Notification of Regulated Hazardous Waste Activity (EPA Form 8700-12) to the U.S. EPA (Attachment A). On the form, Chalum described itself as a Conditionally Exempt Small Quantity Generator based on corrosivity. Elwin Myers, Vice President of Chalum, told EPA inspectors that although corrosivity describes the characteristic of the sulfuric acid used in the process, there is no waste generated from this process.

**SITE INSPECTION**

U.S. EPA and tribal inspectors were escorted through the facility by facility representative Marvin Enos. Mr. Enos indicated that the only solvent used at the facility is acetone, which is used in the cleaning of the fiberglass tanks. About 10 gallons of acetone is kept on site at the facility for cleaning purposes. Dion Polyester resin is used to patch any leaks that may occur in the fiberglass tanks.

Inspectors observed three 55-gallon drums containing a solidified material. According to Mr. Enos, this material was Dion Polyester resin which had solidified and was reusable. The solidified resin would be melted or chopped and then added to the new resin. Inspectors also observed three discarded automobile batteries on a stored on a pallet prior to recycling.

Two half full 5-gallon open plastic containers which contained solid pieces of lead were observed. According to Mr. Enos, the fiberglass storage tanks had been previously lined with lead and when the liners were replaced with fiberglass, the lead

was scraped out of the tanks and stored here until a buyer for the lead is found. Inspectors also observed one 55-gallon drum containing soil contaminated with oil, which had been stored in this location for about two years. The secondary containment structure for a fuel tank was filled with water and oil. Mr. Enos said that they will allow the oil to evaporate. According to Elwin Myers, Vice President of the facility, a shelter has been built over the fuel tank since the inspection to shield it from the sun and to prevent water from running into the secondary containment structure.

According to 40 CFR Part 261.6(a)(3)(ii), used batteries which will be returned to a battery manufacturer for recycling are not subject to RCRA regulation.

Although the containers of discarded lead are considered to be RCRA hazardous wastes, the quantity of waste present on-site at the time of the inspection is not large enough to be regulated by RCRA. At the time of the inspection, the Chalum facility was generating less than 100 kilograms per calendar month of hazardous waste and is therefore a Conditionally Exempt Small Quantity Generator (CESQG) and is not subject to RCRA regulation except as described in 40 CFR 261.5. Although a CESQG may accumulate hazardous waste on-site, if the CESQG accumulates at any time more than a total of 1000 kilograms of hazardous waste, all of those wastes will be subject to regulation under RCRA.

Mr. Marvin Enos  
Chalum, Inc.  
San Tan Industrial Park  
Gila River Indian Reservation  
Sacaton, Arizona 85247

Dear Mr. Enos,

On February 9, 1993, representatives of the U.S. Environmental Protection Agency (U.S. EPA) conducted a Resource Conservation and Recovery Act Compliance Evaluation Inspection (RCRA CEI) at Chalum, Inc. I have attached a copy of the RCRA Trip Report from this inspection.

At the time of the inspection, U.S. EPA inspectors observed that the Chalum facility was generating less than 100 kilograms per calendar month of hazardous waste and is therefore a Conditionally Exempt Small Quantity Generator (CESQG) and is not subject to RCRA regulation except as described in 40 C.F.R., 261.5.

If you have any questions regarding this matter, please contact Laura Gentile of my staff at 415/744-2152.

Sincerely,

Karen Schwinn, Chief  
Waste Compliance Branch  
Hazardous Waste Management Division

Enclosure

cc: Lee Thompson, Gila River Indian Community

bc: Reading file, H-4-1

SYMBOL	H-4-1	H-4-1	H-4			
SURNAME	Gentile	Wong	W for KS			
DATE	3/29/93	3/31/93	3/31/93			

U.S. EPA CONCURRENCES

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